



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
805 SW Broadway, Suite 500
Portland, Oregon 97205

February 18, 2009

Mr. Robert Wyatt
Northwest Natural & Chairman, Lower Willamette Group
220 Northwest Second Avenue
Portland, Oregon 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240 – Invertebrate Tissue-Residue Toxicity Reference Values for the Baseline Ecological Risk Assessment.

Dear Mr. Wyatt:

Between August and October 2008, EPA submitted a series of fish and invertebrate tissue-residue toxicity reference values (TRVs) for use in the baseline ecological risk assessment (BERA) for the Portland Harbor superfund site. On October 10, 2008 a set of invertebrate tissue-residue TRV reconciliation tables were submitted to EPA for review. The invertebrate TRVs were revised based on a series of meetings and discussions culminating with a set of TRVs submitted to EPA on November 13, 2008 and supplemented with additional information regarding PCBs on November 26 and December 1, 2008.

As stated in your letter regarding the fish tissue TRVs dated February 6, 2009, EPA has not yet provided direction regarding fish tissue TRVs. At issue are invertebrate tissue TRVs for cadmium, copper, DDD and PCBs. This letter provides EPA's determination regarding these TRVs.

On November 26, 2008, EPA requested changes to the invertebrate tissue-residue TRVs for Cu and total DDx. These changes were made and revised tables were submitted later in the day on November 26, 2008. The Cu TRV dropped slightly from 8.00 to 7.67 mg/kg whole body wet weight (ww) and the total DDx TRV went up slightly from 0.93 to 0.97 mg/kg ww. At this time, the EPA and the LWG are in agreement regarding TRVs for copper and DDX as well as the other chemicals for which changes were not requested (arsenic, cadmium, zinc, tributyltin, bis (2-ethylhexyl) phthalate, di-n-butyl phthalate and DDD).

On December 1, 2008, additional information was submitted to EPA regarding the invertebrate tissue TRV for PCBs. Based on this information, EPA has determined that the Dillon et al. (1990) and Fowler et al. (1978) studies must be included in the invertebrate tissue-residue TRV for PCBs. EPA understands that the LWG does not agree with the inclusion of

these two studies but we are confident that the Dillon et al. (1990) and Fowler et al. (1978) studies meet the requirements of the TRV development methodology and are thus warranted for inclusion in the development of invertebrate tissue-residue TRVs for PCBs.

If you have any questions, please contact Chip Humphrey at (503) 326-2678 or Eric Blischke (503) 326-4006. All legal inquiries should be directed to Lori Cora at (206) 553-1115.

Sincerely,

Chip Humphrey
Eric Blischke
Remedial Project Managers

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